

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

FEB 1 5 2012

REPLY TO THE ATTENTION OF:

Matthew Stuckey
Chief
Permits Branch
Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue
Indianapolis, Indiana 46204

Dear Mr. Stuckey:

The U.S. Environmental Protection Agency has reviewed both draft Significant Source Modification T063-29896-00029 and draft Significant Permit Modification T-063-29897-00029 for Twin Bridges Recycling located in Danville, Indiana. Based on our review, we have the following comments.

- 1.) Condition D.2.1, located on page 38, establishes Carbon Monoxide (CO) emission limits for the two Caterpillar 3520 landfill-gas fired engines. Please clarify whether the CO emissions limit of 3.3 g/hp-hr applies to each engine individually or both together.
- 2.) Condition D.2.2, located on page 39, requires testing to verify the CO emission factor for each engine within 60 days of reaching maximum capacity but no later than 180 days after initial startup. The emission factor determined by the test is used to ensure compliance with the CO emission limit of 3.3 g/hp-hr. Please explain whether initial testing is sufficient to ensure continuous compliance with the CO emission limit, include additional testing to update the emission factor as necessary, or add other monitoring requirements sufficient to assure compliance.
- 3.) Section E.2 is repeated on pages 44 and 45.

We appreciate the opportunity to comment on these draft permits. Please feel free to contact me or have your staff contact Michael Langman, of my staff, at (312) 886-6867 if you have any questions.

Sincerely,

Genevieve Damico

Chief